

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Ralph I. Miller  
Peter Gruenberger

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	:	Case No. 08-13555 (JMP)
Debtors.	:	

_____	x	
LEHMAN BROTHERS SPECIAL FINANCING INC.	:	
and	:	
LEHMAN BROTHERS HOLDINGS INC.	:	
Plaintiffs,	:	
-against-	:	Adversary Proceeding No.: 09-1261 (JMP)
AMERICAN FAMILY LIFE ASSURANCE COMPANY OF COLUMBUS	:	
and	:	
BNY CORPORATE TRUSTEE SERVICES LIMITED	:	
Defendants.	:	

**STIPULATION REGARDING BRIEFING SCHEDULE AND HEARING  
FOR CROSS-MOTIONS FOR SUMMARY JUDGMENT**

The parties to this adversary proceeding (the “Parties”), plaintiffs and counterclaim defendants Lehman Brothers Special Financing Inc. (“LBSF”) and Lehman

Brothers Holdings Inc. (“LBHI” and, together with LBSF, Debtors), intervenor plaintiff and counterclaim defendant the Official Committee of Unsecured Creditors (together with Debtors, “Plaintiffs”), and defendants and counterclaim plaintiffs American Family Life Assurance Company of Columbus (“Aflac”) and BNY Corporate Trustee Services Limited (“BNY”), by and through their undersigned counsel, stipulate and agree as follows:

1. The following schedule shall govern the pending motion for summary judgment filed by Aflac and cross-motions for summary judgment proposed to be filed in the above-captioned action:

- a) Plaintiffs and BNY shall file any motions for summary judgment by September 25, 2009.
  - b) The Parties shall file any responses to the motions for summary judgment by October 23, 2009.
  - c) The Parties shall file any replies in support of their motions for summary judgment by November 9, 2009.
  - d) The Court will conduct a hearing on the motion described above on November 19, 2009 at 10:00a.m, or any other date which is convenient for the Court, either immediately before, immediately after, or at the same time as the hearing in Case No. 09-1242 (JMP).
2. Any party may, for good cause shown, seek to modify the foregoing schedule.
3. This stipulation is executed and entered into without prejudice to the claims or

defenses of the Parties.

Dated: August 14, 2009  
New York, New York

Dated: August 14, 2009  
Wilmington, Delaware

WEIL, GOTSHAL & MANGES LLP

BY: /s/ Ralph I. Miller  
Ralph I. Miller

767 Fifth Avenue  
New York, New York 10153  
Tel: (202) 682-7000  
Fax: (202) 857-0940

Counsel for Plaintiff Lehman Brothers  
Special Financing Inc.

Dated: August 14, 2009  
Pittsburgh, Pennsylvania

REED SMITH LLP

BY: /s/ Eric Schaffer  
Eric Schaffer

Eric Schaffer  
225 Fifth Avenue  
Pittsburgh, PA 15222  
Tel: (412) 288 3131  
Fax: (412) 288 3063

Counsel for Defendant BNY Corporate  
Trustee Services Limited

SO ORDERED:

Dated: August 20, 2009  
New York, New York

/S/ James M. Peck  
UNITED STATES BANKRUPTCY JUDGE

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

BY: /s/ Robert A. Weber  
Robert A. Weber

One Rodney Square  
P.O. Box 636  
Wilmington Delaware 19899-0636  
Tel: (302)651-3144  
Fax: (888)329-2975

Counsel for Defendant American Family Life  
Assurance Company of Columbus

Dated: August 14, 2009  
Washington, D.C.

MILBANK, TWEED, HADLEY & M<sup>C</sup>CLOY  
LLP

BY: /s/ David S. Cohen  
David S. Cohen

1850 K Street, NW  
Suite 1100  
Washington, DC 20006  
Tel: (202) 202-835-7500  
Fax: (202) 263-7586

Counsel for the Official Committee of  
Unsecured Creditors of Lehman Brothers  
Holdings Inc., *et al.*